

21. **Allowable Emissions:** The Permittee shall not allow emissions into the atmosphere to exceed any of the following limits:

	Daily Emission Limits	Twelve Month Rolling Average Emission Limits
Total Volatile Organic Compounds (VOCs)		
Total Particulates		
Particulates Smaller Than 10 Microns (PM10)		
Any Single Hazardous Air Pollutant (HAP)		
Total of All HAPs		

The twelve month rolling average shall be calculated at the end of each calendar month by summing the total over the most recent twelve calendar months.

22. **Coating VOC Limits:**

- A. The Permittee shall not apply any topcoats, sealers, or opaque coatings to wood-products surfaces on millwork unless the VOC content is limited to the following, less water and non-precursor organic compounds:

Table 1

<u>Category</u>	<u>pounds_{voc}/gallon (lbs/gal)</u>	<u>grams_{voc}/l (gm/l)</u>
Non-opaque topcoat	5.29	635
Non-opaque sealer	5.38	645
Non-opaque acid-cured alkyd amino topcoat	5.45	655
Non-opaque acid-cured, alkyd amino vinyl sealer	5.66	680
Opaque: Topcoat, Sealer, Primer, Groundcoat, Basecoat or Stain	5.10	610

- B. Certain coatings can exceed the limits in Table 1. These are:
1. A sealer has no VOC limit when all of its topcoat(s) have no more than 3.83 lb/gal (460 g/l).

2. When a sealer contains no more than 2.3 lb/gal (275 g/l), and the gun applying the topcoat over such sealer is clearly tagged with a red four (4) inch square, vivid, durable tag/sticker/label/painted emblem visible on the gun or within three (3) feet of the gun on the gun hose, the VOC limit for all the topcoats over such sealer is 5.66 lb/gal (680 g/l). Acid-cured, alkyd amino coatings are exempt from these gun tagging requirements.
3. When the completed, consumer ready finish, which has received only one application of resin based coating serves as both sealer and top coat and has a total average dry finish thickness from the top of the finish to the surface of the wood product substrate does not exceed 3 mils before sanding, is applied in a single application and the gun spraying such coating is clearly tagged with a red four (4) square inch, vivid, durable tag/sticker/label/painted emblem is visible on the gun or within three (3) feet of the gun on the gun hose, the VOC limit for that coating is 5.66 lb/gal (680 g/l). Acid-cured, alkyd amino coatings are exempt from these gun tagging requirements.
- C. Non-opaque stains, washcoats, glazes, toners, inks and other non-opaque coatings not specified in Permit condition 22.A. above have no VOC limits.
- D. The Permittee shall not use a strippable booth coating containing more than 3.0 lb/gal (360 g/l), as applied.
- E. The VOC limits for finishing materials given in this Permit Condition 22 apply to such coatings whether applied directly onto any area of wood product substrate or on any intermediate layer(s) of coating on the wood product substrate.
- F. If a completed finish is opaque but, by itself, neither the topcoat nor the basecoat nor the primer/sealer is opaque, at least one of such coatings shall not exceed 5.1 lb/gal (610 g/l) as applied.
- G. In a dispute between the Control Officer and the Permittee as to whether a coating, which visually appears opaque to the Control Officer on a particular millwork surface, is opaque and therefore shall not exceed 5.1 lb/gal (610 g/l) as applied, the finish shall be judged opaque if either the coating is described as opaque by the manufacturer or the material has a contrast ratio exceeding 84% at 1 dry mil (0.025 mm) of coating thickness.

23. Controls:

- A. The Permittee shall conduct all spray coating activities in a paint booth equipped with exhaust filters which are certified by the manufacturer and accepted by the Control Officer as having a minimum over spray removal efficiency of at least 92% for this type or similar types of applications. The Permittee shall install and maintain the exhaust filters in accordance with the manufacturer's recommendations, with no gaps or visible openings.
- B. The Permittee is allowed to meet the VOC limits of Permit Condition 22 by using an emission control system which reduces VOC emissions overall, including capture and processing, by at least 81 percent by weight.

24. **Spray Coating Applications:**

A. The Permittee shall not spray millwork with coating exceeding 4.29 lb/gal (515 g/l) without providing evidence of possession and use of a low pressure spray gun or system, an electrostatic system, or a system that atomizes principally via hydraulic pressure, including air assisted airless and ultra-low-volume-air assisted technologies.

B. The Permittee shall not use a conventional air-atomized spray gun or other restricted use gun, except:

1. To apply finishing materials that have a VOC content not exceeding 4.29 lb/gal (515 g/l).
2. If VOC emissions from the finishing application station, employing such a gun, are captured and directed to an emission control system complying with the provisions of Rule 346 Appendix A.
3. For touch-up and repair only under either of the following conditions:
 - a) such application is performed after completion of the entire finishing operation; or
 - b) such application is performed after applying stain, and before any further coating, by equipment having a total capacity not exceeding 2.1 gallons (8 liters).
4. To apply less than 5% of all coating, pursuant to permit condition 24.C

C. In addition to the uses of restricted-use guns allowed under permit condition 23.B. above, the Permittee may use a conventional air-atomized or other restricted use gun to apply coatings exceeding 4.29 lb/gal (515 g/l) if all of the following conditions are met:

1. The volume of such coating applied in this way is less than 5% of the total volume of millwork coating applied at the facility;
2. Each gun has a red four (4) inch square, vivid, durable tag/sticker/label/painted emblem visible on the gun or within three (3) feet of the gun on the gun hose when spraying materials exceeding 4.29 lb/gal; and
3. The Permittee keeps a log according to Permit Condition 26.D. of the amount of coating used by each such gun. This shall be done daily or each time coating is added to the gun's coating reservoir; semi-annual calculations shall be made pursuant to Permit Condition 26.B.

25. **Other:**

A. The Permittee shall not clean spray booth components using a solvent containing more than 8.0 percent by weight of VOC (including water and non-precursor compounds) except for conveyors, continuous coaters and their enclosures, and/or metal filters. If the spray booth coating is being replaced, the Permittee shall not use more than 1.0 gallon (3.8 liters) of VOC solvent to clean the booth.

B. The Permittee shall collect all solvent(s) used to clean spray guns and shall pump or drain all solvent used for line cleaning into non-leaking

container(s). Such containers shall be immediately closed or covered after all the solvent has been collected, and shall remain so except when in use.

C. The Permittee shall cover and keep covered each VOC-containing material which is not currently in use. The permittee shall store finishing and cleaning materials in closed or covered containers.

D. The Permittee shall store all VOC-containing materials intended for disposal including, but not limited to, rags, waste coatings, waste solvents and their residues, in closed containers which are legibly labeled with their contents and which remain covered when not in use.

E. Nothing in this permit exempts the Permittee from complying with the National Emission Standards for Hazardous Air Pollutants for coating wood furniture and fixtures or from complying with any other applicable Federal, state, and local laws or regulations.

26. Record Keeping and Reporting: The Permittee shall keep the following records and lists in a consistent and complete manner and shall make them available to the Control Officer without delay during normal business hours. VOC-containing materials shall be listed legibly and completely.

A. Current List:

1. A current list of all VOC-containing materials shall be maintained which contains the name or code and the VOC content of each. Any qualified single resin layer finish shall be identified as such. VOC containing materials shall be listed legibly and completely.

a) Two VOC-content values must appear for each topcoat, sealer, and booth coating: both pounds/gallon (grams/liter) including water and non-precursor organic compounds, and pounds/gallon (grams/liter) less water and non-precursor organic compounds. These two values will be identical if the coating has neither water or non-precursors.

b) Use grams/liter (or lb/gal) for coatings that are not sealers topcoats, or booth coatings and for non-coatings such as reducers, thinners, cleaners, etc.

2. A current list shall be maintained of the manufacturer's recommended mix ratio of components, including but not limited to any reducers and catalyst/hardeners that you add, except when the manufacturer has no recommendations for any additions.

B. Updates for non compliant material: Daily usage quantities of each topcoat, sealer or booth material that exceeds applicable VOC limits of Permit Condition 22.A, 22.D., or 25.A shall be totaled and logged by the end of the following workday. VOC content shall be entered for each such material.

C. Updates for compliant materials: For materials compliant with the Permit Conditions 22 & 25, by the end of the following month, the Permittee shall update the following records for each month:

1) For each topcoat and sealer to which reducer or other VOC-containing diluent is added at any time after its arrival at a facility, enter its highest VOC content in lbs/gal (or g/l) less water and non-precursor organic compounds.

2. The amount of coating, the amount of catalyst/hardener, and the amount of reducer/coating diluent used.
3. The quantity and type of organic solvent used each month for stripping and cleaning;
4. The quantity of organic solvent disposed of off site.
5. Exception: For material known to be used in amounts less than 15 gallons (57 liters) per year, the totals of the usage of each VOC containing material will be updated yearly.

D. Records associated with Permit Condition 24 shall be kept. These records shall show for each semi-annual period the total volume of finishing material usage applied by any and all methods, and the volume of finishing materials exceeding 4.29 lb/gal (515 g/l) applied with conventional air-atomized spray equipment. In addition the total volume of all finishing material used throughout the facility shall be determined. Divide the total volume so applied over the previous six months by the total of all coatings used in the same period and enter these calculations and the result in the log.

E. The Permittee shall keep records of disposal/recovery of all VOC containing materials.